

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA	§	
	§	
v.	§	Criminal No. 4-20-CR-26-S2
	§	
KHALID ABDULAZIZ	§	

**GOVERNMENT'S OFFER OF TRIAL EXHIBITS
PURSUANT TO LOCAL RULE CrLR 55.2**

TO THE HONORABLE JUDGE GREGG COSTA:

COMES NOW the United States of America, by and through Jennifer B. Lowery, United States Attorney in and for the Southern District of Texas, and Jennifer C. Stabe, and Lisa M. Collins, Assistant United States Attorneys, and files this offer of trial exhibits pursuant to local rule CrLR 55.2.

I.

CrLR 55.2 provides in pertinent part:

Authentication of Exhibits. A party requiring authentication of an exhibit must notify the offering party in writing within 7 days after the exhibit is listed and made available. Failure to object in advance of trial in writing concedes authenticity.

Objections to Exhibits. Objections to admissibility of exhibits must be made at least 7 days before trial by notifying the Court in writing of the disputes, with copies of the disputed exhibit and authority.

II.

The Government intends to introduce, among other things, the exhibits listed in the

attached Government's Exhibit List.

III.

The exhibits have been made available via hard drives and/or flash drives given to defense counsel on December 29, 2020, January 5, 2021, April 22, 2021, July 1, 2021, and on March 7, 2022. Additionally, throughout the case, discovery has been uploaded through the United States Attorney's Office file exchange system and sent via email and as of March 28, 2022 all exhibits have been given to defense counsel except for the Graphical Summary of March 9, 2020 tolls, the ATF Form 4473's from the purchases made by CI #1 and CI #2 and the DVR video extraction. These items will be disclosed as soon as practicable.

WHEREFORE, PREMISES CONSIDERED, the Government requests that the defendant comply with CrLR 55.2.

Respectfully submitted,

JENNIFER B. LOWERY
United States Attorney

/s/ Jennifer C. Stabe
Jennifer C. Stabe
Assistant United States Attorney
1000 Louisiana
Suite 2300
Houston, Texas 77002
713-567-9711

/s/ Lisa M. Collins
Lisa M. Collins
Assistant United States Attorney
1000 Louisiana
Suite 2300
Houston, Texas 77002
713-567-9700

CERTIFICATE OF SERVICE

On March 28, 2022, the Government served a copy of its Offer of Trial Exhibits Pursuant to CLR 55.2 by ECF and by email upon Cordt Akers and Derek Hollingsworth, counsel of record for defendant Khalid Abdulaziz.

/s/ Jennifer C. Stabe

Jennifer C. Stabe

Assistant United States Attorney

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

**§
§ Criminal No. 4:20-CR-26-S2**

§
§ **GREGG COSTA**
§ **JUDGE**

VS.

§
§ **JESUS GUAJARDO**
§ **COURTROOM CLERK**

§
§
§
§ COURT REPORTER
§

KHALID ABDULAZIZ

GOVERNMENT'S EXHIBIT LIST

NO.	DESCRIPTION	OFFER	OBJ	ADMIT	N/ADM
1	Photo of Barrett .50 caliber rifle	Yes/No	Yes/No		
2	Photo of AR 15	Yes/No	Yes/No		
3	Photo of AK 47	Yes/No	Yes/No		
4	Photo of .308	Yes/No	Yes/No		
5	Photo of M2	Yes/No	Yes/No		
6	Blank 4473	Yes/No	Yes/No		
7	Organizational Chart with Pictures to ID parties	Yes/No	Yes/No		
8	Aerial Map of Zeroed In Armory	Yes/No	Yes/No		
9	ATF Blue Ribbon Files February 20, 2013 through August 7, 2015	Yes/No	Yes/No		
10	ATF Blue Ribbons October 21, 2014 through March 23, 2021	Yes/No	Yes/No		
11	Israel Chapa 4473 from 7/11/2019	Yes/No	Yes/No		
12	Israel Chapa 4473 from 7/17/2019	Yes/No	Yes/No		
13	Israel Chapa 4473 from 8/26/2019	Yes/No	Yes/No		
14	Israel Chapa 4473 from 8/30/2019	Yes/No	Yes/No		
15	Israel Chapa 4473 from 9/5/2019	Yes/No	Yes/No		

NO.	DESCRIPTION	OFFER	OBJ	ADMIT	N/ADM
16	Israel Chapa 4473 from 10/1/2019	Yes/No	Yes/No		
17	Israel Chapa 4473 from 10/4/2019	Yes/No	Yes/No		
18	Israel Chapa 4473 from 10/7/2019	Yes/No	Yes/No		
19	Israel Chapa 4473 from 10/11/2019	Yes/No	Yes/No		
20	Israel Chapa 4473 from 10/16/2019	Yes/No	Yes/No		
21	Israel Chapa 4473 from 10/18/2019	Yes/No	Yes/No		
22	Israel Chapa 4473 from 10/22/2019	Yes/No	Yes/No		
23	Israel Chapa 4473 from 10/24/2019	Yes/No	Yes/No		
24	Israel Chapa 4473 from 11/1/2019	Yes/No	Yes/No		
25	Israel Chapa 4473 from 11/14/2019	Yes/No	Yes/No		
26	Israel Chapa 4473 from 11/24/2019	Yes/No	Yes/No		
27	Israel Chapa 4473 from 11/27/2019	Yes/No	Yes/No		
28	Israel Chapa 4473 from 12/3/2019	Yes/No	Yes/No		
29	Israel Chapa 4473 from 12/4/2019	Yes/No	Yes/No		
30	Israel Chapa 4473 from 12/5/2019	Yes/No	Yes/No		
31	Photo of Barrett boxes in truck	Yes/No	Yes/No		
32	Photo of shipping label	Yes/No	Yes/No		
33	Camacho Phone Seized on 12/5/2019 in Brownsville, Texas	Yes/No	Yes/No		
34	Brownsville Phone Dump – Item 14	Yes/No	Yes/No		
35	Whats App String between Isaac and Camacho November 28-Dec 4 2019	Yes/No	Yes/No		
36	“Translation” of WhatsApp	Yes/No	Yes/No		
37	Video – Ammo shown within Zeroed in Armory	Yes/No	Yes/No		
38	Video – Isaac Rodriguez filming M2 inside Zeroed In Armory	Yes/No	Yes/No		
39	Video – Isaac Rodriguez discussing money with Khalid Abdulaziz inside Zeroed In Armory	Yes/No	Yes/No		
40	Phone Tolls – Isaac Rodriguez	Yes/No	Yes/No		
41	Phone Tolls – Khalid Abdullaziz	Yes/No	Yes/No		

NO.	DESCRIPTION	OFFER	OBJ	ADMIT	N/ADM
42	Summary Chart of Tolls from March 9, 2020	Yes/No	Yes/No		
43	Graphical Summary of March 9, 2020 tolls	Yes/No	Yes/No		
44	Summary Chart of Tolls with Straw Purchasers	Yes/No	Yes/No		
45	Summary Chart of Tolls between Isaac Rodriguez and Khalid Abdulaziz	Yes/No	Yes/No		
46	Graphical Summary of Tolls between Khalid Abdulaziz and co-defendants	Yes/No	Yes/No		
47	Consent to search phone – Victor Camacho	Yes/No	Yes/No		
48	Cell Phone iPhone 11 – Item 5	Yes/No	Yes/No		
49	Cell Phone, Cricket U304AA – Item 6	Yes/No	Yes/No		
50	Victor Camacho Consent Phone Dump from Cricket – Item 7	Yes/No	Yes/No		
51	Victor Camacho Consent Phone Dump from iPhone 11 – Item 8	Yes/No	Yes/No		
52	WhatsApp String between Victor Camacho and Isaac Rodriguez Dec 17-19, 2019	Yes/No	Yes/No		
53	“Translation of WhatsApp String”	Yes/No	Yes/No		
54	Photo of behind seat area of Victor Camacho’s truck	Yes/No	Yes/No		
55	Photo of firearms wrapped with tape	Yes/No	Yes/No		
56	Photo of additional firearms wrapped with tape	Yes/No	Yes/No		
57	Photo of ammunition found in vehicle	Yes/No	Yes/No		
58	Photo of speaker box with magazines	Yes/No	Yes/No		
59	Close up photo of drum magazines in speaker box	Yes/No	Yes/No		
60	Photo of inside of Victor Camacho’s truck	Yes/No	Yes/No		
61	Photo of Victor Camacho’s residence	Yes/No	Yes/No		
62	Photo of magazine box	Yes/No	Yes/No		

NO.	DESCRIPTION	OFFER	OBJ	ADMIT	N/ADM
63	Photo of firearms boxes	Yes/No	Yes/No		
64	Diamondback Arms, Model DB-10, .308 caliber rifle, SN DB-7007498	Yes/No	Yes/No		
64a	Photo of Diamondback Arms, Model DB-10, .308 caliber rifle, SN DB-7007498	Yes/No	Yes/No		
64b	Close up photo of Diamondback Arms, Model DB-10, .308 caliber rifle, SN DB-7007498	Yes/No	Yes/No		
65	Diamondback Arms, Model DB-10, .308 caliber rifle, SN DB-7003521	Yes/No	Yes/No		
65a	Photo of Diamondback Arms, Model DB-10, 308 caliber rifle, SN DB-7003521	Yes/No	Yes/No		
65b	Close up photo of Diamondback Arms, Model DB-10, 308 caliber rifle, SN DB-7003521	Yes/No	Yes/No		
66	Diamondback Arms, Model DB-10, .308 caliber rifle, SN DB-7003463	Yes/No	Yes/No		
66a	Photo of Diamondback Arms, Model DB-10, .308 caliber rifle, SN DB-7003463	Yes/No	Yes/No		
66b	Close up Photo of Diamondback Arms, Model DB-10, .308 caliber rifle, SN DB-7003463	Yes/No	Yes/No		
67	Diamondback Arms, Model DB-10, .308 caliber rifle, SN DB-7007490	Yes/No	Yes/No		
67a	Photo of Diamondback Arms, Model DB-10, .308 caliber rifle, SN DB-7007490	Yes/No	Yes/No		
67b	Close up photo of Diamondback Arms, Model DB-10, .308 caliber rifle, SN DB-7007490	Yes/No	Yes/No		
68	Photo of Glock Pistol	Yes/No	Yes/No		
69	Photo of Glock Pistol Close Up	Yes/No	Yes/No		
70	Close up photo of firearms box SN DB-7006209	Yes/No	Yes/No		
71	Close up photo of firearms box for PS90	Yes/No	Yes/No		
72	Photo of Barrett .50 caliber case in back of vehicle	Yes/No	Yes/No		

NO.	DESCRIPTION	OFFER	OBJ	ADMIT	N/ADM
73	Black iPhone 11 Pro belonging to Isaac Rodriguez – Item 22	Yes/No	Yes/No		
74	Data Extraction from Item 22	Yes/No	Yes/No		
75	Isaac Rodriguez Emails Image 177	Yes/No	Yes/No		
76	Isaac Rodriguez Emails Image 180	Yes/No	Yes/No		
77	Isaac Rodriguez Emails Image 53	Yes/No	Yes/No		
78	Isaac Rodriguez Emails Image 54	Yes/No	Yes/No		
79	Isaac Rodriguez Emails Image 57	Yes/No	Yes/No		
80	Isaac Rodriguez Emails Image 174	Yes/No	Yes/No		
81	Isaac Rodriguez Emails Image 103	Yes/No	Yes/No		
82	Isaac Rodriguez Emails Image 104	Yes/No	Yes/No		
83	Isaac Rodriguez Emails Image 166	Yes/No	Yes/No		
84	Isaac Rodriguez Emails Image 207	Yes/No	Yes/No		
85	Isaac Rodriguez Emails Image 49	Yes/No	Yes/No		
86	Isaac Rodriguez Emails Image 50	Yes/No	Yes/No		
87	Isaac Rodriguez Emails Image 182	Yes/No	Yes/No		
88	Isaac Rodriguez Emails Image 183	Yes/No	Yes/No		
89	Isaac Rodriguez Emails Image 184	Yes/No	Yes/No		
90	Isaac Rodriguez Emails Image 185	Yes/No	Yes/No		
91	Isaac Rodriguez Emails Image 186	Yes/No	Yes/No		
92	Isaac Rodriguez Emails Image 187	Yes/No	Yes/No		
93	Invoice for 105 AK-47 rifles	Yes/No	Yes/No		
94	Invoice for 15 .308 caliber rifles Image 153	Yes/No	Yes/No		
95	Video of Victor Camacho Traffic Stop – Deputy Tondera	Yes/No	Yes/No		
96	Photo of .50 caliber rifle in trunk	Yes/No	Yes/No		
97	Close up photo of .50 caliber rifle in trunk	Yes/No	Yes/No		
98	Photo of obliterated serial number	Yes/No	Yes/No		
99	Photo of obliterated serial number	Yes/No	Yes/No		
100	Photo of assembled .50 caliber rifle	Yes/No	Yes/No		

NO.	DESCRIPTION	OFFER	OBJ	ADMIT	N/ADM
101	Javier Cavazos, III 4473 from 11/21/2019	Yes/No	Yes/No		
102	Javier Cavazos, III 4473 from 12/12/2019	Yes/No	Yes/No		
103	Javier Cavazos, III 4473 from 12/18/2019	Yes/No	Yes/No		
104	Javier Cavazos, III 4473 from 1/8/2020	Yes/No	Yes/No		
105	Javier Cavazos, III 4473 from 3/4/2020	Yes/No	Yes/No		
106	Barrett Firearms, Model 82A1 .50 caliber BMG rifle SN: AA009174	Yes/No	Yes/No		
106a	Photo of Barrett 1	Yes/No	Yes/No		
106b	Photo of Barrett 2	Yes/No	Yes/No		
107	Ashley Giddens 4473 from 11/7/2019	Yes/No	Yes/No		
108	Ashley Giddens 4473 from 11/14/2019	Yes/No	Yes/No		
109	Ashley Giddens 4473 from 11/15/2019	Yes/No	Yes/No		
110	Ashley Giddens 4473 from 12/16/2019	Yes/No	Yes/No		
111	Ashley Giddens 4473 from 12/18/2019	Yes/No	Yes/No		
112	Steve Baranowski, III 4473 from 3/9/2020	Yes/No	Yes/No		
113	Steve Baranowski, III 4473 from 3/15/2020	Yes/No	Yes/No		
114	Mario Reyna 4473 from 3/24/2020	Yes/No	Yes/No		
115	Mario Reyna 4473 from 3/27/2020	Yes/No	Yes/No		
116	Mario Reyna 4473 from 4/13/2020	Yes/No	Yes/No		
117	Mario Reyna 4473 from 4/21/2020	Yes/No	Yes/No		
118	Mario Reyna 4473 from 4/23/2020	Yes/No	Yes/No		
119	Jesus Calvo 4473 from 3/3/2020	Yes/No	Yes/No		
120	David Bedolla 4473 from 1/14/2020	Yes/No	Yes/No		
121	Francisco Jacinto 4473 from 1/17/2020	Yes/No	Yes/No		
122	Francisco Jacinto 4473 from 1/18/2020	Yes/No	Yes/No		
123	Francisco Jacinto 4473 from 2/20/2020	Yes/No	Yes/No		
124	Francisco Jacinto 4473 from 2/21/2020	Yes/No	Yes/No		
125	Francisco Jacinto 4473 from 2/26/2020	Yes/No	Yes/No		
126	Francisco Jacinto 4473 from 3/20/2020	Yes/No	Yes/No		

NO.	DESCRIPTION	OFFER	OBJ	ADMIT	N/ADM
127	Khalid Abdulaziz Statement – January 2020	Yes/No	Yes/No		
128	Photo of Riley Defense Inc., model RAK 47, .762 caliber rifle, SN: B15064	Yes/No	Yes/No		
129	Close up photo of Riley Defense Inc., model RAK 47, .762 caliber rifle, SN: B15064	Yes/No	Yes/No		
130	Photo of photo Riley Defense Inc., model RAK 47, .762 caliber rifle, SN: B15026	Yes/No	Yes/No		
131	Close up photo of Riley Defense Inc., model RAK 47, .762 caliber rifle, SN: B15026	Yes/No	Yes/No		
132	Photo of Riley Defense Inc., model RAK 47, .762 caliber rifle, SN: B15025	Yes/No	Yes/No		
133	Close up photo of Riley Defense Inc., model RAK 47, .762 caliber rifle, SN: B15025	Yes/No	Yes/No		
134	Photo of Taurus, model G2C, 9 mm caliber pistol, SN: TMS81600	Yes/No	Yes/No		
135	Close up photo of Taurus, model G2C, 9 mm caliber pistol, SN: TMS81600	Yes/No	Yes/No		
136	Photo of Glock, Model 19GEN4, 9mm caliber pistol, SN: BKZW940	Yes/No	Yes/No		
137	Close up photo of Glock, Model 19GEN4, 9mm caliber pistol, SN: BKZW940	Yes/No	Yes/No		
138	Riley Defense Inc., model RAK 47, .762 caliber rifle, SN: B12442	Yes/No	Yes/No		
138a	Photo of Riley Defense Inc., model RAK 47, .762 caliber rifle, SN: B12442	Yes/No	Yes/No		
138b	Close up Photo of Riley Defense Inc., model RAK 47, .762 caliber rifle, SN: B12442				
139	CI Phone Call 1 from 3/26/20	Yes/No	Yes/No		
140	CI Phone Call 2 from 3/26/20	Yes/No	Yes/No		
141	CI #1 Camera 3/27/20	Yes/No	Yes/No		
142	CI #2 Camera 3/27/20 part 1	Yes/No	Yes/No		

NO.	DESCRIPTION	OFFER	OBJ	ADMIT	N/ADM
143	CI #2 Camera 3/27/20 part 2	Yes/No	Yes/No		
144	CI #2 Camera 3/27/20 part 3	Yes/No	Yes/No		
145	ATF Form 4473 from 3/27/20 purchase	Yes/No	Yes/No		
146	Romarm/Cugir, Model PSL-54C, .762 caliber rifle, SN: S563619	Yes/No	Yes/No		
146a	Photo of Romarm/Cugir, Model PSL-54C, .762 caliber rifle, SN: S563619	Yes/No	Yes/No		
146b	Close up photo of Romarm/Cugir, Model PSL-54C, .762 caliber rifle, SN: S563619	Yes/No	Yes/No		
147	Steyr Arms, Inc., Model AUG/A3 M1, .223 caliber rifle, SN: 14USA269	Yes/No	Yes/No		
147a	Photo of Steyr Arms, Inc., Model AUG/A3 M1, .223 caliber rifle, SN: 14USA269	Yes/No	Yes/No		
147b	Close up photo of Steyr Arms, Inc., Model AUG/A3 M1, .223 caliber rifle, SN: 14USA269	Yes/No	Yes/No		
148	Recorded Call 4/7/20	Yes/No	Yes/No		
149	Recorded Call 4/10/20	Yes/No	Yes/No		
150	Recorded Call 4/15/20 #1	Yes/No	Yes/No		
151	Recorded Call 4/15/20 #2	Yes/No	Yes/No		
152	Recorded Call 4/15/2 #3	Yes/No	Yes/No		
153	CI #1 Camera 4/16/20 Part 1	Yes/No	Yes/No		
154	CI #1 Camera 4/16/20 Part 2	Yes/No	Yes/No		
155	CI #2 Camera 4/16/20 Part 1	Yes/No	Yes/No		
156	CI #2 Camera 4/16/20 Part 2	Yes/No	Yes/No		
157	CI #2 Camera 4/16/20 Part 3	Yes/No	Yes/No		
158	CI #2 Camera 4/16/20 Part 4	Yes/No	Yes/No		
159	CI #2 Camera 4/16/20 Part 5	Yes/No	Yes/No		
160	ATF Form 4473 from 4/16/2020 purchase	Yes/No	Yes/No		
161	Anderson Manufacturing, model AM-15, multi caliber rifle, SN: 20066879	Yes/No	Yes/No		

NO.	DESCRIPTION	OFFER	OBJ	ADMIT	N/ADM
161a	Photo of Anderson Manufacturing, model AM-15, multi caliber rifle, SN: 20066879	Yes/No	Yes/No		
161b	Close up photo of Anderson Manufacturing, model AM-15, multi caliber rifle, SN: 20066879	Yes/No	Yes/No		
162	Zastava, model OPAP M70, .762 caliber rifle, SN: OPAP004375	Yes/No	Yes/No		
162a	Photo of Zastava, model OPAP M70, .762 caliber rifle, SN: OPAP004375	Yes/No	Yes/No		
162b	Close up photo of Zastava, model OPAP M70, .762 caliber rifle, SN: OPAP004375	Yes/No	Yes/No		
163	Recorded Call 4/21/20	Yes/No	Yes/No		
164	Recorded Call 4/24/20	Yes/No	Yes/No		
165	Recorded Call 4/28/20	Yes/No	Yes/No		
166	CI #1 Camera 4/28/20 Part 1	Yes/No	Yes/No		
167	CI #1 Camera 4/28/20 Part 2	Yes/No	Yes/No		
168	CI #1 Audio Only 4/28/20	Yes/No	Yes/No		
169	CI #2 Camera 4/28/20 Part 1	Yes/No	Yes/No		
170	CI #2 Camera 4/28/20 Part 2	Yes/No	Yes/No		
171	CI #2 Camera 4/28/20 Part 3	Yes/No	Yes/No		
172	CI #2 Camera 4/28/20 Part 4	Yes/No	Yes/No		
173	ATF Form 4473 from 4/28/20 purchase	Yes/No	Yes/No		
174	Allied Armament, Inc., Model M3, SN: 2214459	Yes/No	Yes/No		
174a	Photo of Allied Armament, Inc., Model M3 SN: 2214459	Yes/No	Yes/No		
174b	Close up photo of Allied Armament, Inc., Model M3 SN: 2214459	Yes/No	Yes/No		
175	Anderson Manufacturing, model AM-15, .556 caliber rifle seized on 4/29/2020 SN: 20091973	Yes/No	Yes/No		
175a	Photo of Anderson Manufacturing, model AM-15, multi caliber rifle seized on 4/29/2020	Yes/No	Yes/No		

NO.	DESCRIPTION	OFFER	OBJ	ADMIT	N/ADM
175b	Close up Photo of Anderson Manufacturing, model AM-15, multi caliber rifle seized on 4/29/2020	Yes/No	Yes/No		
176	Khalid Abdulaziz Statement from 4/29/20	Yes/No	Yes/No		
177	Zeroed In Armory Acquisition and Disposition Book	Yes/No	Yes/No		
178	Relevant pages of ZIA A&D Book	Yes/No	Yes/No		
179	Intuit Quickbook Financial Records	Yes/No	Yes/No		
180	Summary Chart of Financial Records	Yes/No	Yes/No		
181	DVR video extraction	Yes/No	Yes/No		
182	.50 caliber ammunition demonstrative	Yes/No	Yes/No		
183	.308 round of ammunition demonstrative	Yes/No	Yes/No		
184	.223 round of ammunition demonstrative	Yes/No	Yes/No		
185	9 mm round of ammunition demonstrative	Yes/No	Yes/No		